

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA**

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MATTIE PERRY,

Plaintiff,

v.

FRED'S STORES OF TENNESSEE INC. d/b/a  
FRED'S SUPER DOLLAR,

Defendant.

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Case No.: 6:16-cv-00154

**Jury Demanded**

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**AGREED PROTECTIVE ORDER**

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Upon good cause shown, and by agreement of the parties, through counsel, the Court herewith orders that any company records, personnel records, videos, handbooks, training materials, policy manuals or other documents produced in discovery in this Civil Action, including excerpts of or compilations from therein (collectively, "the records") shall be subject to the following restrictions:

- (a) The records or any copies of the records shall not be circulated to any person other than counsel, the parties, and the Court;
- (b) The contents of the records shall not be disclosed to any person other than counsel, the parties, and the Court except for expert witnesses as designated by the parties;
- (c) The records shall be used only for purposes of the instant litigation;
- (d) At the termination of this Civil Action, including all appeals, or upon the expiration of the time period for appeal with no appeal having been taken, any records furnished by any defendant and all copies thereof in the possession of

opposing counsel or parties shall be returned to counsel for the respective defendant or destroyed with written certification of destruction being provided to counsel for the respective defendant.

SO ORDERED, this 28th day of February, 2017.



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G.R. SMITH  
UNITED STATES MAGISTRATE  
JUDGE

Agreed and Approved:

/s/ Patrick G. Walker

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Patrick G. Walker GA Bar No. 110556  
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